

Plaintiff Equal Employment Opportunity Commission (EEOC) moves this Court to compel Turner Rascoe and James Dorsey, officers of Judgment Debtor Above All Odds (AAO) to provide responses to Interrogatories and Requests for Production of Documents propounded on June 2, 2022. To date, neither Turner nor Dorsey has responded to the Interrogatories and Requests for Production. Therefore, this motion is not subject to the requirements of Local Rule 104.8. EEOC has attempted to meet and confer with Rascoe and Dorsey without success. The EEOC's efforts to conference are set forth in its contemporaneously filed Certificate of Rule 104.7 Conference.

1. A party that has obtained a judgment may propound discovery to enforce the judgment and move to compel responses to the discovery without reopening the case. *First Technology Capital, Inc. v. Airborne, Inc.*, 380 F.Supp.3d 217, 220 (W.D.N.Y. 2019).

2. On June 2, 2022 EEOC propounded discovery to Raymond Dorsey and Turner Rascoe, officers of AAO, to discover information regarding the assets of AAO and to determine if they were in possession of property belonging to AAO; had received transfers of funds from AAO; were the alter egos of AAO or; whether AAO had a successor in interest.
3. The discovery requests were hand-delivered to Raymond Dorsey on June 7, 2022 by a process server. Turner Rascoe received the discovery requests on June 12, 2022, also hand-delivered by a process server.
4. Neither Rascoe nor Dorsey has responded to the discovery requests.
5. EEOC's efforts to receive responses without the involvement of the Court are set forth in its contemporaneously filed Certificate of Rule 104.7 Conference.
6. The attached memorandum of law and supporting materials demonstrate that EEOC is entitled to an order compelling Turner and Dorsey to respond to the discovery requests within 14 days.

Respectfully submitted,

/s/ Eric S. Thompson
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Certificate of Service

I, Eric S. Thompson, hereby certify that on this 24th, day of August 2022, the foregoing was served by regular mail to:

Raymond Dorsey
158 Barnsfield Ct 1
Gaithersburg, MD
20878

Turner Rascoe
503 Goldeneye Ct.
Edegewood, MD
21040

Respectfully submitted,

/S/

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